

EXHIBIT B

From: treywhite@villawhite.com
To: Farrell, Thomas M.; Shaw, Jarrod D.
Cc: Leslie Luttrell
Subject: Discovery Responses and Request for Discovery Conference
Date: Monday, July 22, 2024 6:26:55 PM
Importance: High

****EXTERNAL EMAIL; use caution with links and attachments****

Tom: I wanted to discuss the Trustee's Responses to Production request issued by Wells Fargo. Here are the issues:

1. A number of responses require the production of documents that are readily available on PACER. We intend to respond by designating the Docket Numbers of responsive documents.
2. There are a number of requests that we believe are not relevant. However, the Trustee is in possession of boxes that were delivered to him by Chris Pettit that may contain responsive documents especially as to the request for payroll records. These boxes are in storage. We agree to make these boxes available to you for inspection and allow you to tag any documents that you feel you need. We will then redact the document and produce the redacted version. However, as we believe these documents are not relevant, we expect your client to pay for the costs associated with reproduction.

Please let me know your position on the above.

In addition, we are in receipt of Wells Fargo's responses to request for production and responses to interrogatories in the Verstuyft litigation. We would like to have a conference **tomorrow** regarding Wells Fargo's complete lack of response to these discovery requests. Leslie and I are available anytime tomorrow. Otherwise, we will be filing a motion to compel and will seek all other remedies available.

I look forward to your immediate response.

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